

**From:** [TARNOW Karen E](#)  
**To:** [Kristine Koch/R10/USEPA/US@EPA](#)  
**Cc:** [Chip Humphrey/R10/USEPA/US@EPA](#); [Eric Blischke/R10/USEPA/US@EPA](#); [matt.mcclincy@state.or.us](#); [TARNOW Karen E](#)  
**Subject:** RE: FW: anderson brothers  
**Date:** 09/23/2009 10:09 AM

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I agree that we need info to feed to the WQ program; there's also the issue of needing to keep track of which sites we'd circle back to if we determine in the future that additional source control is needed for certain contaminants - but I'm not sure that the SCD is the right place to capture this info. Your comment letter is prodding me to think about how we should be capturing that info. It has also provoked some thoughts about how to refine the language in our SCDs to more accurately describe our rationale. I'm going to give this some thought and get back to you - hopefully soon - with a proposal about how to handle this stuff.

-----Original Message-----

From: Koch.Kristine@epamail.epa.gov [mailto:Koch.Kristine@epamail.epa.gov]

Sent: Wed 9/23/2009 9:26 AM

To: TARNOW Karen E

Cc: Humphrey.Chip@epamail.epa.gov; blischke.eric@epa.gov; matt.mcclincy@state.or.us; TARNOW

Karen E Subject: Re: FW: anderson brothers

Karen, I agree that there are limitations about how far DEQ Cleanup Program can take storm water source control, but DEQ water program can take things further. My comments are based on the big picture and meant to build a record for DEQ Cleanup Program to take to DEQ water program to support additional needs for storm water permits in the Portland Harbor area. I'm available for a conference call on several days in the next couple weeks. If you want to meet in person, Oct 19 would be the first day I'd be available.

Regards,

Kristine Koch  
Remedial Project Manager  
USEPA, Office of Environmental Cleanup

U. S. Environmental Protection Agency  
Region 10  
1200 Sixth Avenue, Suite 900, M/S ECL-115  
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"TARNOW Karen E"  
<TARNOW.Karen@deq.state.or.us>

09/21/2009 04:41  
PM

Kristine Koch/R10/USEPA/US@EPA To  
cc  
Eric Blischke/R10/USEPA/US@EPA,  
Chip Humphrey/R10/USEPA/US@EPA,  
<matt.mcclincy@state.or.us>,  
"TARNOW Karen E"  
<TARNOW.Karen@deq.state.or.us>  
Subject  
FW: anderson brothers

Kristine - thanks much for sharing this in draft form. As I suspected, there appear to be a couple of "kinks" to work out to gain EPA's buy-in on our stormwater SCDs..

I'd like to propose that we get together, with Matt, Chip and Eric if they are interested, to talk about these stormwater decisions. We (DEQ) feel that there are reasonable and legal limits to how far we can require an RP to go on their stormwater evaluation. Unfortunately, that can result in a less-than-desirable level of certainty about stormwater source control at the site. We'd like to talk about how we can best manage these somewhat competing realities, and I believe it's best done by considering how stormwater decisions fit in to the context of the broader CERCLA process. [See the attached email for a previous suggestion to meet on this same topic.]

Can we make time to do this within the next few weeks - before the draft RI comes out and we all get distracted by that?

Karen

-----Original Message-----

From: Koch.Kristine@epamail.epa.gov  
[mailto:Koch.Kristine@epamail.epa.gov]  
Sent: Monday, September 21, 2009 12:12 PM  
To: TARNOW Karen E  
Subject: Re: anderson brothers

Karen - here is draft letter.

(See attached file: Anderson SCD Letter to DEQ.doc)

Kristine Koch  
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USEPA, Office of Environmental Cleanup

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"TARNOW Karen E"  
<TARNOW.Karen@de  
q.state.or.us>

09/16/2009 10:38  
AM

Kristine Koch/R10/USEPA/US@EPA  
cc  
Subject  
anderson brothers

Hi Kristine -

You may have already wrapped up your comments on the Anderson Bros SCD, but if they haven't been finalized yet, I was wondering if you'd want to share them in a draft form first. Since Anderson Bros is supposed to be the first test case under our new guidance, it would be nice to have the chance to work out any kinks - if necessary - before your comments are on the record.

(See attached file: Anderson SCD Letter to DEQ.doc)

----- Message from "TARNOW Karen E" <TARNOW.Karen@deq.state.or.us> on  
Wed, 22 Jul 2009 13:02:52 -0700 -----

To: <koch.kristine@epa.gov>

Subject: meeting in Portland?

Hi Kristine -

I wondered if I could catch some time with you on one of your upcoming trips to Portland. I'd like to discuss a scenario we are likely to see as we wrap up our stormwater evaluations on the low/medium priority sites. Here's a hypothetical example:

A site has completed their SW evaluation and implemented appropriate source control measures, and DEQ feels it has the info it needs to determine that any legacy sources are eliminated or controlled and that the site is doing a good job with SW management/BMPs. The problem is that in 2 of the 4 stormwater samples collected after SCMs were implemented, they got hits of PCBs at 0.2 - 0.3 ug/l (elevated but not screaming). From our perspective, the only things they could do to knock that back would be quite expensive, e.g., repaving, sophisticated end of pipe treatment, etc.

As you might imagine, we're reluctant to make them do those things at this juncture without clear justification. Essentially, I'd like to talk with you about the justification piece - i.e., what's our basis for deciding one way or the other. I think it'd be helpful to think about this in the context of the CERCLA process as a whole, to make sure that the decisions we make about stormwater at various stages in the process fit together in some logical fashion.

I'm thinking of this as being a low key, brainstorming session and will probably ask Matt to join us. Feel free to invite Chip or Eric if you feel like it. I don't expect to figure it all out in one sitting but hope we can define where we need to go with it.

Thanks

Karen (After today, I'm out of the office until August 3)

Karen Tarnow  
Oregon DEQ  
Portland Harbor Stormwater Coordinator  
503-229-5988

